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# Supreme Court of the United States

DIVNA MASLENJAK,

*Petitioner,*

*v.*

UNITED STATES OF AMERICA,

*Respondent.*

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

## BRIEF OF ASIAN AMERICANS ADVANCING JUSTICE | AAJC, NATIONAL ASSOCIATION OF LATINO ELECTED AND APPOINTED OFFICIALS EDUCATIONAL FUND AND 72 OTHER ORGANIZATIONS AS *AMICI CURIAE* IN SUPPORT OF PETITIONER

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## INTEREST OF *AMICI CURIAE*[1]

Amici are 74 national and local non-profit organizations and bar associations that promote equality, justice, and civil rights for immigrants and the value of immigration to the nation.

Asian Americans Advancing Justice | AAJC (AAJC) is a national nonprofit organization founded in 1991. Based in Washington, D.C., AAJC works to advance and protect civil and human rights for Asian Americans and to build and promote a fair and equitable society for all. AAJC is one of the nation's leading experts on issues of importance to the Asian American community, including immigration and immigrants' rights. Along with its Advancing Justice affiliates, AAJC works to promote justice and bring national and local constituencies together through community outreach, advocacy, and litigation.

The National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund is a Section 501(c)(3) nonprofit, nonpartisan organization whose members include the nation's more than 6,100 elected and appointed Latino officials. NALEO Educational Fund is dedicated to facilitating full Latino participation in the American political process, from citizenship to public service.

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1. Both Petitioner and Respondent have consented to the filing of this brief. Petitioner has filed a blanket consent to the filing of amicus curiae briefs. A letter of consent from Respondent has been filed with the Clerk. Pursuant to Rule 37.6, the undersigned hereby affirm that no counsel for a party authored this brief in whole or in part and no person other than amici or their counsel made a monetary contribution to the preparation or submission of this brief.

AAJC, NALEO, and 15 other amici are members of the New Americans Campaign, a nonpartisan, national network of legal-service providers, faith-based organizations, businesses, foundations and community leaders dedicated to promoting citizenship and removing barriers to naturalization. Through free naturalization workshops, clinics, and other services, the New Americans Campaign has helped complete over 250,000 naturalization applications, saving eligible immigrants and their families over $206 million in legal and application fees.

Descriptions of the additional 72 amici are included in the appendix to this brief. Many amici also provide direct naturalization services and are familiar with the challenges that eligible immigrants face in applying for naturalization. All amici work with or on behalf of immigrant communities and are concerned about the harmful effects of chilling naturalization and broadly penalizing naturalized Americans for minor lapses.

This case addresses an issue of great importance to amici and the communities on behalf of which amici advocate: whether an immaterial false statement or omission in an immigration status proceeding will be punishable with the severe consequences of denaturalization and criminal prosecution. As amici know firsthand, the naturalization process can be long and complicated and requires applicants to make hundreds of factual representations, in response to often ambiguous questions, about events spanning their entire lives. If any trivial factual misstatement could violate the statutes at issue in this case, untold numbers of naturalized citizens would be at risk of losing their citizenship and liberty years after they have become full American citizens.

Equally important, the mere threat of denaturalization and prosecution for irrelevant misstatements made years ago would further discourage communities that are already reluctant to seek citizenship. The threat of denaturalization would effectively create two unequal classes of citizenship, with natural-born citizens secure in their rights and status in a way that naturalized citizens would not be. Amici submit this brief to highlight the great harms to naturalized citizens and the country that would result if naturalized citizenship could be stripped because of any immaterial false statement.

## SUMMARY OF THE ARGUMENT

The Sixth Circuit's holding—that under 18 U.S.C. § 1425(a) and 18 U.S.C. § 1015(a), *any* knowing false statement or omission can be grounds for denaturalization and criminal prosecution—would have dire consequences for naturalized citizens, significantly discourage lawful immigrants from seeking citizenship, and undermine a cornerstone of American society and values. As amici know well, the naturalization process is rife with potential for irrelevant misstatements, particularly for applicants who speak English as a second language and apply without the benefit of professional assistance. If any irrelevant misstatement can be grounds for denaturalization and prosecution, a substantial number of citizens will be placed at risk.

The risk of criminal prosecution and denaturalization threatens to create two unequal classes of citizens. Natural-born Americans would enjoy complete security in their citizenship, while naturalized immigrants would fear losing their citizenship and freedom—even years

after naturalizing—based on any knowing misstatement or omission during the naturalization process, no matter how trivial. The fear that would hang over the families and communities of naturalized citizens would undermine the stability and security that immigrants seek in naturalizing and further depress already low naturalization rates among immigrants who are eligible for citizenship. Unlike citizens born here, naturalized citizens would be subject to disproportionate and unfair punishments for irrelevant misstatements and omissions—that have no bearing on their qualification for citizenship—and suffer a host of other inequities in the criminal justice system.

The nation would suffer severely from an environment of fear and uncertainty that chills naturalization. Naturalization produces immense benefits to both naturalized citizens and the country as a whole. Not only do immigrants who naturalize obtain concrete rights that promote their assimilation into American society, but citizenship in and of itself substantially improves immigrants' lives and economic outcomes. Moreover, the country as a whole benefits when immigrants become full and equal members of society. The nation has a great deal to lose from discouraging naturalization by severely punishing citizens based on trivial misstatements and omissions made while seeking citizenship.

For these reasons, amici respectfully urge the Court to reverse the Sixth Circuit's decision and side with the First, Fourth, Seventh, and Ninth Circuits in holding that Sections 1425(a) and 1015(a) are violated *only* when an individual procures naturalization by a *material* false statement.

## ARGUMENT

### I. THE POTENTIAL FOR WIDESPREAD DENATURALIZATION AND PROSECUTION FOR IMMATERIAL MISSTATEMENTS AND OMISSIONS IS REAL AND SUBSTANTIAL.

The naturalization process provides numerous opportunities for misstatements and omissions. Not only are the pitfalls apparent on the face of the application, but the experiences of many amici in assisting naturalization applicants highlight just how easy it is to make misstatements that, under the Sixth Circuit's ruling below, would place many citizens at risk of denaturalization and criminal prosecution.

#### A. The Naturalization Application Is Rife With Potential For Immaterial Misstatements And Omissions.

If trivial misstatements and omissions in the application process can be punished with criminal prosecution and denaturalization, the naturalization application, Form N-400 Application for Naturalization, will become a minefield for naturalization applicants. Form N-400 contains up to 107 questions, many of which require detailed written answers. The application also uses ambiguous language and is accompanied by multiple pages of detailed instructions. The application can be particularly perplexing for applicants who do not speak English as their first language. *See* National Foundation for American Policy, *Reforming the Naturalization Process*, at 4 (2011) ("A prospective naturalization applicant who is proficient in English and eminently

capable of passing the citizenship examination may have difficulty with some of the language in the application and the instructions whereby deterring him or her from applying for citizenship."). Immigrants thus face numerous opportunities to make immaterial misstatements or omissions when completing their applications.

For example, the application asks for "every location where you have lived during the last five years." Form N-400 at 3. The instructions require the applicant to "include the dates for each place you have lived in a month, day, and year format (mm/dd/yyyy)." Instructions to Form N-400 at 6. The application also asks if the applicant has "**EVER** been a member of, involved in, or in any way associated with, any organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other location in the world" or has "**EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested." Form N-400 at 12, 14 (emphasis in original). These questions compel applicants to recall events spanning the entire history of their lives with perfect accuracy. They potentially require applicants to remember and record every instance in which they may have exceeded the speed limit, or consumed alcohol underage. The difficulty of answering these questions precisely can be compounded by numerous factors including advanced age, traumatic events preceding the applicant's migration to the United States, a lack of documentation for events occurring in the applicant's country of origin, and frequent moves after arriving in America. In short, Form N-400 contains an array of questions that create risk for immaterial misstatements on matters that do not implicate the applicant's "moral

character" or compliance with other requirements for naturalization. *See* 8 U.S.C. § 1427(a) (requirements for naturalization).

The difficulty of answering every question with complete accuracy is increased because many people seeking naturalization do so without the guidance of an attorney or other professional assistance, increasing the likelihood of inaccuracies and misstatements during the application process. Moreover, many individuals provide inaccurate statements based on poor advice from *notarios*—individuals who falsely represent themselves as qualified to offer paid legal advice in order to take advantage of unsuspecting, vulnerable and often desperate immigrants. *See generally* Elinor R. Jordan, *What We Know and Need to Know about Immigrant Access to Justice*, 67 S.C. L. Rev. 295, 311 (2016) (describing the "rampant" problem of unauthorized practice of immigration law in the United States). Thus, not only do naturalization applicants often lack professional assistance, but many rely on guidance from individuals who, far from acting in the applicants' interests, are conning them. The daunting naturalization process, lengthy application, and lack of legal representation make it all too easy for honest, law-abiding applicants to knowingly include immaterial misstatements in their applications.[2]

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2. Under the Sixth Circuit's interpretation, these misstatements could be made "knowingly" regardless of the applicant's intention. The modifier "knowingly" means simply that an individual must be conscious of the nature of an alleged misstatement or omission. The inclusion of "knowingly" in the statute does not require the government to prove that the individual intended to violate the law or unlawfully obtain citizenship. *See, e.g.*, Brief for Petitioner at 11 (filed Feb. 27, 2017).

### B. *Amici* Have Seen Firsthand The Potential For Immaterial Misstatements And Omissions In Naturalization Applications.

Amici that work directly with naturalization applicants have seen firsthand the pitfalls of the naturalization application process. In addition to the extraordinarily broad Form N-400 questions highlighted above, the experience of many amici in assisting naturalization applicants shows that even seemingly straightforward questions are often perilous in ways that may not be apparent at first blush.

For instance, Form N-400 asks if applicants have been married to two people at the same time. Form N-400 at 15. In many amici's experience, applicants often answer "No" despite having previously married someone in their home country from whom they have been estranged for years but never divorced before remarrying. Several amici have also assisted applicants who failed to identify children born out of wedlock because they were ashamed about their infidelity, or failed to identify children living out of the country because they wrongly believed they only needed to name children in the United States. Applicants also sometimes inaccurately report dates of foreign travel on their Form N-400. For example, applicants living near the Mexican border frequently make day-trips to Mexico for shopping or to visit family, and fail to report the trips or only give approximate dates rather than verifying the precise dates of travel.

The application also asks whether the applicant has ever "been convicted of a crime or offense," *id.* at 14, a question that can often perplex applicants who have

been convicted of crimes but later had them expunged. Form N-400 also asks whether the applicant has ever "claimed to be a U.S. citizen" or "registered to vote in any Federal, state, or local election in the United States." *Id.* at 11. With states beginning to implement automatic voter registration (AVR)—six states and the District of Columbia have approved AVR, and many others have introduced bills to add AVR—noncitizens could be at risk of being erroneously registered to vote automatically. *See, e.g., Taylor Dobbs, State In The Process Of Fixing Error That Caused Ineligible Voters To Be Registered,* Vermont's NPR News Source, Feb. 3, 2017 ("Problems with the implementation of Vermont's automatic voter registration system led to some Vermont residents who are not eligible to vote being added to the state's voter rolls . . . .") *available at* http://digital.vpr.net/post/state-process-fixing-error-caused-ineligible-voters-be-registered#stream/0. A noncitizen who was automatically registered to vote—even if only temporarily—could fail to appreciate that he or she must answer this question affirmatively.

Under the Sixth Circuit's holding, misstatements and omissions of this nature, while having no direct bearing on the applicants' eligibility for citizenship, could be grounds for denaturalization and prosecution years after the applicant has gained citizenship.

## II. THE SIXTH CIRCUIT'S RULING WOULD RELEGATE NATURALIZED CITIZENS TO SECOND-CLASS CITIZENSHIP.

The Sixth Circuit's ruling would create two vastly unequal classes of citizenship. Naturalized citizens,

unlike citizens born here, would face uncertainty about their place in this country knowing that government officials had the power to strip their citizenship over minor, technical inaccuracies in their applications. Untold numbers of naturalized citizens would be at risk of losing citizenship. This fear would undermine the greatest value of naturalization: creating a permanent sense of belonging in this country. In response to this fear, naturalized citizens could retreat from civic and social life, and immigrants that are already reluctant to naturalize would be further discouraged from seeking citizenship. This second-class citizenship would be stark in the criminal justice system, where naturalized citizens would face a range of inequities. Consigning naturalized immigrants to second-class citizenship would contravene core constitutional values holding that naturalized citizens are full and equal members of society.

### A. The Sixth Circuit's Ruling Could Lead To Widespread Denaturalization And Cause Immigrants To Retreat From Civic Life.

The Sixth Circuit's interpretation could subject many already-naturalized citizens to prosecution and denaturalization. In response to the threat of denaturalization, many naturalized citizens could retreat from civic and social participation.

Each year, hundreds of thousands of immigrants become naturalized American citizens—in fiscal year 2016, 752,772 naturalizations were approved. *See Number of N-400 Applications for Naturalization by Category of Naturalization, Case Status, and USCIS Field Office Location* (2016), *available at* https://www.uscis.gov/

tools/reports-studies/immigration-forms-data/data-set-form-n-400-application-naturalization. As of 2014, there were approximately 20 million naturalized citizens in the United States. Jie Zong and Jeanne Batalova, *Naturalization Trends in the United States*, Migration Policy Institute (Aug. 10, 2016), *available at* http://www.migrationpolicy.org/article/naturalization-trends-united-states. Considering the sheer number of naturalized citizens and the complexity of the naturalization form and other immigration status applications, thousands of applications, or more, might contain some minor inaccuracy or misstatement. Affirming the Sixth Circuit's ruling would thus potentially subject many U.S. citizens to criminal prosecution and denaturalization.

This threat could lead naturalized citizens to retreat from civic and social life. Criminal prosecution for an immaterial misstatement or omission could lead to deportation from the United States. *See* 8 U.S.C. § 1451(e). When immigrants fear deportation, they are less likely to report crime. *See* Leslye E. Orloff, Mary Ann Dutton, Giselle Aguilar Hass, Nawal Ammar, *Battered Immigrant Women's Willingness to Call for Help and Police Response*, 13 UCLA Women's L.J. 43, 68 (2003) (explaining that battered immigrants are more likely to call police for help with domestic violence if they have "stable permanent immigration status"); *Study: Latinos Fear Reporting Crimes Because of Deportation Push*, United Press International (May 7, 2013). As a number of U.S. mayors noted in a 2015 letter to Congress: "When immigrant residents can report crime without fear of deportation, immigrants are more willing to engage with local police and government institutions, our streets and neighborhoods are safer, and those who commit crime are

more likely to be brought to justice." Mike Lillis, *Mayors Press Congress to Oppose Sanctuary City Bills*, The Hill, July 22, 2015. Fear of deportation also forces immigrants to "disengage from social and economic institutions of power for fear of being discovered." Andrew Tae-Hyun Kim, *Immigrant Passing*, 105 Ky. L.J. 95, 106 (2017); *see also* Arelis R. Hernández and Patricia Sullivan, *'It's fear, fear, fear': As enforcement increases, more immigrants avoid public places*, Wash. Post, Feb. 26, 2017 (describing how the fear of deportation in "immigrant-rich suburbs" of Washington, D.C. has quickly led immigrants to retreat from society, including "adults [...] skipping English classes" and "keeping children home from school" and dwindling business "at markets and shops in immigrant neighborhoods"). By chilling voluntary interactions with law enforcement and other civic engagement, the threat of denaturalization and deportation for immaterial misstatements and omissions could damage the social fabric of immigrant-rich communities.

### B. Devaluing Naturalized Citizenship Would Further Depress Naturalization Rates.

If immaterial misstatements during the naturalization process are punishable with denaturalization and criminal sanctions, communities that already naturalize at very low rates will be further discouraged from seeking citizenship. Despite the myriad economic and civic benefits of naturalization, millions of eligible immigrants have yet to naturalize. As of 2016, 8.5 million adults in the United States were eligible to naturalize but had not done so. *See* Manuel Pastor and Jared Sanchez, *Promoting Citizenship: Assessing the Impacts of the Partial Fee Waiver* at 1 (May 2016). Indeed, less than *ten percent* of

those eligible to naturalize become citizens. *See* María E. Enchautegui and Linda Giannarelli, *The Economic Impact of Naturalization on Immigrants and Cities, Executive Summary* at IV (Dec. 2015). Almost 70% of the individuals who could naturalize but have not naturalized became eligible for citizenship more than 15 years ago. National Immigration Forum, *The Road to Naturalization: Addressing the Barriers to U.S. Citizenship* at 1. The naturalization rate in the United States lags behind many European countries and far behind Australia and Canada. Mary C. Waters and Marisa Gerstein Pineau, National Academics of Science, Engineering and Medicine, *The Integration of Immigrants into American Society*, Summary at 10-11 (2015).

These statistics reflect the many obstacles to naturalization that immigrants face, including high costs, language barriers, a complex application process, and insufficient civic infrastructure. Pastor and Sanchez, *Promoting Citizenship* at 1. Given the already low rate of naturalization in the United States, a law subjecting naturalized citizens to an increased threat of criminal prosecution and denaturalization for immaterial mistakes and omissions in the application process will only serve to further devalue naturalized citizenship and chill naturalization rates.

### C. The Sixth Circuit's Ruling Would Acutely Harm Naturalized Citizens In The Criminal Justice System.

The inequities between natural-born and naturalized citizens under the Sixth Circuit's ruling would be particularly evident in the criminal justice system.

First, criminal prosecution and denaturalization are disproportionate, unfair punishments for immaterial false statements. Proportionality is an established constitutional constraint on criminal punishments. *Solem v. Helm*, 463 U.S. 277, 286 (1983); *Weems v. United States*, 217 U.S. 349, 367 (1910) (It is "a precept of justice that punishment for crime should be graduated and proportioned to offense."). The Eighth Amendment's proportionality principle "does not require strict proportionality between crime and sentence" but forbids extreme sentences that are "grossly disproportionate" to the crime. *Harmelin v. Michigan*, 501 U.S. 957, 997, 1001 (1991).

In light of these constitutional values, denaturalization is an overly harsh punishment for innocuous falsities. "To take away a man's citizenship deprives him of a right no less precious than life or liberty." *Klapprott v. United States*, 335 U.S. 601, 616 (1949) (Rutledge, J., concurring in result). American citizenship "is a precious right" and "[s]evere consequences may attend its loss, aggravated when the person has enjoyed his citizenship for many years." *Costello v. United States*, 365 U.S. 265, 269 (1961). Denaturalization is "more serious than a taking of one's property, or the imposition of a fine or other penalty," *Schneiderman v. United States*, 320 U.S. 118, 122 (1943), and thus "naturalization decrees should not be lightly set aside," *Costello*, 365 U.S. at 269. Denaturalization cannot, under established constitutional principles, be a penalty for a mistake as minimal as making an immaterial false statement in applying for immigrant status or citizenship.

Second, the Sixth Circuit's holding would incentivize the government to pursue denaturalization in criminal rather than civil cases. Civil claims under 8 U.S.C. § 1451

would require proving that the false statement was material while criminal charges under Section 1425(a) would not. Thus in cases involving false statements in naturalization proceedings where materiality is uncertain, the government would have a perverse incentive to bring denaturalization proceedings as criminal rather than civil cases. These prosecutions would subject defendants to harsher punishments—including imprisonment for 10 to 25 years—all for statements that might not merit penalties under the civil statute.

Third, given the ease of finding an immaterial misstatement in a naturalization application, prosecutors would have significantly more leverage over naturalized citizens than natural-born citizens. A prosecutor bringing charges against a naturalized citizen could review the defendant's naturalization application and other immigration files, find a potential misstatement, and add a charge under Section 1425(a). The prosecutor would then have immense leverage to extract guilty pleas to other charges in exchange for dropping the Section 1425(a) charge and preserving the defendant's citizenship.

Although criminal denaturalization is currently rare, the prosecutorial discretion permitted by the Sixth Circuit's construction has the potential to affect millions of American citizens. Under the Sixth Circuit's rule, this discretion could quickly lead to increased efforts to investigate, prosecute, and denaturalize significant numbers of American citizens, subjecting immigrant communities to fear and uncertainty.

### D. Dual-Class Citizenship Would Contravene Core National Values.

The Sixth Circuit's decision threatens to create a two-class system of citizenship that is irreconcilable with the concept of equality in which our national ideals are grounded. "Citizenship obtained through naturalization is not a second-class citizenship." *Knauer v. United States*, 328 U.S. 654, 658 (1946). As Justice Harlan observed in his dissent in *Plessy v. Ferguson*, "[o]ur Constitution . . . neither knows nor tolerates classes among citizens." 163 U.S. 537, 559 (1896) (dissenting opinion). "[T]he rights of citizenship of the native born and of the naturalized person are of the same dignity and are coextensive. The only difference drawn by the Constitution is that only the 'natural born' citizen is eligible to be President." *Schneider v. Rusk*, 377 U.S. 163, 165 (1964); *see also id.* at 168 (Fifth Amendment's Due Process Clause prohibited law permitting denaturalization of citizen for continuously living in their country of origin, a form of "discrimination aimed at naturalized citizens" that "create[d] ... a second-class citizenship" and thus was "so unjustifiable as to be violative of due process") (internal quotations omitted).

But the Sixth Circuit's ruling would unavoidably relegate naturalized citizens to a second class. The citizenship of naturalized Americans would be precarious due to the threat of a random inspection of their application papers years after they have become citizens, while natural-born Americans would enjoy citizenship rights that are secure and inalienable. Naturalized citizens would face inequities in the criminal justice system that would not befall natural-born citizens. This class distinction between American citizens violates fundamental principles of equality that define American citizenship.

## III. THE SIXTH CIRCUIT'S HOLDING WOULD JEOPARDIZE THE BENEFITS IMMIGRANTS AND THE COUNTRY REAP FROM NATURALIZATION.

Finally, the Sixth Circuit's holding would undermine the substantial benefits of naturalization to both naturalized citizens and the nation. Naturalization is integral to our nation's character and provides concrete benefits to both naturalized citizens and the country as a whole. For this reason, national policy has long valued naturalization in light of the principles that "all persons are created equal" and that the law should "allow persons of all backgrounds, whether native or foreign-born, to have an equal stake in the future of the United States." *USCIS Policy Manual,* Vol. 12, Ch. 1, *available at* https://www.uscis.gov/policymanual/Print/PolicyManual.html.

Naturalization greatly improves the lives of immigrants. Citizenship confers concrete legal and civic rights, including the right to vote and serve on juries, the ability to obtain and travel with a U.S. passport, and access to jobs with the federal government, the nation's largest employer. *See* U.S. Citizenship and Immigration Services, *A Guide to Naturalization* at 6 (revised Nov. 2016), *available at* https://www.uscis.gov/sites/default/files/files/article/M-476.pdf. Most of all, naturalized citizens gain a sense of stability in the United States that only citizenship can provide, as naturalized citizens are free from risk and fear of deportation while lawful permanent residents can be deported for a range of criminal convictions. Naturalized citizens can also obtain derivative citizenship for their immediate family members, which further strengthens their ties to and security in the

country. The Sixth Circuit's rule would undermine this sense of security both by imperiling the citizenship of naturalized immigrants and discouraging naturalization by immigrants eligible for citizenship.

The value of this sense of security and permanence is evident in the fact that naturalized citizens enjoy substantially better economic outcomes than noncitizen immigrants. For example, a study published in September 2012 found that "[n]aturalized citizens earn between 50 and 70 percent more than noncitizens," "have higher employment rates" than noncitizens, "and are half as likely to live below the poverty line as noncitizens." *The Economic Value of Citizenship for Immigrants in the United States* at 11 (Sept. 2012). On average, naturalized immigrants earn more per year than either non-citizen immigrants or U.S.-born citizens. Manuel Pastor and Justin Scoggins, *Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy* at 6 (Dec. 2015). Moreover, a study published in December 2015 found that naturalization alone—when isolated from other factors—increases earnings of immigrants 8.9 percent, increases their probability of homeownership by 6.3 percent, and increases overall employment 2 percentage points. *The Economic Impact of Naturalization on Immigrants and Cities,* Executive Summary at VI. For naturalized citizens, U.S. citizenship can be a transformative force in improving their lives.

Naturalization also produces substantial economic benefits for the country. For instance, a December 2012 study found that due to the significant economic contributions of naturalized citizens, if at least *half* of those eligible to naturalize did so, the annual GDP would

increase between $37 billion and $52 billion. *Citizen Gain: The Economic Benefits of Naturalization for Immigrants and the Economy* at 20. A study published in 2015 examined 21 sample cities and found that, due to the vast economic benefits of citizenship, those cities would enjoy $5.7 billion in increased earnings, more than $2 billion in additional tax revenue, and as many as 45,000 more homeowners if all of the naturalization-eligible immigrants in those cities became citizens. *The Economic Impact of Naturalization on Immigrants and Cities* at 2.

Beyond these real economic gains, citizenship also increases immigrants' civic engagement. Greater naturalization increases the size of the electorate as naturalized citizens may legally vote. Studies show that naturalized Hispanic and Asian American citizens vote at higher rates than their U.S.-born counterparts. Pew Research Center, *Immigrant naturalization applications climb, but not as much as past years* (Sept. 2016). Moreover, the United States has a long and proud tradition of service by naturalized immigrants in public office, including Elaine Chao, the Secretary of Labor under President George W. Bush and current Secretary of Transportation; former Governor of California Arnold Schwarzenegger and former Governor of Michigan Jennifer Granholm; and scores of naturalized citizens who are serving or have served as federal and state legislators and judges.

In short, it is very much in the nation's interest to encourage immigrants who are eligible for citizenship to naturalize, and to ensure that naturalized citizens are secure in their citizenship. Not only does naturalization strengthen societal bonds by integrating immigrants

as full and equal members of society, but the country enjoys real, measurable benefits from naturalization. This reality has long served as a driving force behind our national policy that values naturalized citizens and their contributions to American society. *See, e.g.*, USCIS Policy Manual, Vol. 12, Ch. 1 (explaining the policy principles undergirding naturalization policy, including that "[t]he United States has a long history of welcoming immigrants from all parts of the world" and "values the contributions of immigrants who continue to enrich this country and preserve its legacy as a land of freedom and opportunity"). These vital ideals, and the great benefits conferred by naturalized citizens upon the nation, would be imperiled if the Sixth Circuit's holding becomes the law nationwide.

## CONCLUSION

The judgment of the Court of Appeals should be reversed.

Respectfully submitted,

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# APPENDIX

## APPENDIX — IDENTIFICATION OF *AMICI*

African Law Center, Inc.

African Law Center (ALC) seeks to advance the civil, human, and legal rights of African immigrants and refugees living in the United States by concentrating on providing linguistically accessible and culturally appropriate legal and social support services to low-income families and those with limited English proficiency. The African Law Center engages in individual representation of immigrants, community legal education, and systemic advocacy.

American-Arab Anti-Discrimination Committee

The American-Arab Anti-Discrimination Committee (ADC) is the country's largest Arab American civil rights organization, with members from all 50 states and multiple chapters nationwide. Founded in 1980 by U.S. Senator James Abourezk, ADC is a non-partisan and secular non-profit grassroots organization. ADC has been at the forefront of protecting the Arab-American community for over thirty-five years against discrimination, racism, and stereotyping.

American Citizens for Justice/Asian American Center for Justice

American Citizens for Justice, and its office the Asian American Center for Justice (ACJ), is an IRC 501(c)(3) civil rights organization devoted to advocating for and protecting the civil rights interests of the Asian American

community, and all communities of color. ACJ was founded in 1983 following the baseball bat beating death of Vincent Chin, a 27-year old Chinese American.

Asian Americans Advancing Justice – Asian Law Caucus

Asian Americans Advancing Justice – Asian Law Caucus was founded in 1972 with a mission to promote, advance, and represent the legal and civil rights of Asian and Pacific Islanders, with a particular focus on low-income members of those communities. Advancing Justice – ALC is part of a national affiliation of Asian American civil rights groups, with offices in Los Angeles, Chicago, Atlanta and Washington DC. Advancing Justice – ALC has a long history of protecting and advocating for immigrant communities through direct legal services, impact litigation, community education, and policy work.

Asian American Advancing Justice – Atlanta

Asian Americans Advancing Justice – Atlanta is the first legal and policy center dedicated to defending democracy for Asian Americans, immigrants and refugees, in Georgia and the southeast. Through its four core program areas—civic engagement, policy advocacy, legal services, and leadership development—Advancing Justice – Atlanta works to build a stronger voice for the New American majority in the New South. As an organization that serves immigrants, it is critical to Advancing Justice – Atlanta's mission that the rights of all immigrants be protected.

*Appendix*

Asian Americans Advancing Justice – Chicago

Asian Americans Advancing Justice – Chicago (AAAJ-Chicago) is a nonprofit organization that works to empower the Asian American community through advocacy, education, research, and coalition building. AAAJ – Chicago fights for laws and policies that promote social, economic, and political equity for the Asian American community as a whole.

Asian Americans Advancing Justice – Los Angeles

Asian Americans Advancing Justice – LA's mission is to advocate for civil rights, provide legal services and education, and build coalitions to positively influence and impact Asian Americans, Native Hawaiians, and Pacific Islanders and to create a more equitable and harmonious society.

Asian American Bar Association of Greater Chicago

The Asian American Bar Association of Greater Chicago is a professional bar association serving the interests of thousands of Asian American legal professionals and community members. Our mission includes promoting the professional growth of our members; mentoring law students and new lawyers; providing services to the community; and offering policy recommendations on legal, social, political, and economic interests significant to our community. Protecting the rights and interests of naturalized citizens goes to the very core of our mission.

*Appendix*

Asian American Bar Association of San Francisco Bay Area

Asian American Bar Association of San Francisco Bay Area (AABA) is one of the largest Asian American bar associations in the nation and one of the largest minority bar associations in the State of California. From its inception in 1976, AABA and its attorneys have been actively involved in civil rights issues and community service. AABA stands firmly with amici and their community members, many of whom are naturalized citizens, in the belief that naturalized citizens are essential to the fabric of American society. It would be fundamentally unfair and un-American to penalize people with denaturalization and deportation for minor misstatements.

Asian American Community Services

Asian American Community Services (AACS) is a community-based organization in Central Ohio that seeks to improve the well-being and quality of life of Asian/Pacific Islanders through a broad range of social services, education, and community outreach. Every day, we work to address the various social, linguistic, cultural, and other barriers faced by our clients who consist largely of immigrants and children/grandchildren of immigrants including many naturalized citizens. We understand the critical need to ensure that the civil rights of all immigrants are respected.

*Appendix*

Asian American Lawyers Association of Massachusetts

Since its inception in 1984, the Asian American Lawyers Association of Massachusetts (AALAM) has devoted its energy and resources to serving the Asian American legal community and improving and facilitating the administration of law and justice. AALAM serves as a professional and social network for its over 250 members who include lawyers, judges, law professors, and law students.

Asian Americans United

Since 1985, Asian Americans United has existed so that people of Asian ancestry in Philadelphia exercise leadership to build their communities and unite to challenge oppression.

Asian and Pacific Islanders American Vote

Asian and Pacific Islanders American Vote (APIAVote) is a national nonpartisan organization that works with partners to mobilize Asian Americans and Pacific Islanders (AAPIs) in electoral and civic participation. In addition to engaging, educating and mobilizing AAPI voters, ensuring access to the ballot is a critical component to APIAVote's vision of a world that is inclusive, fair, and collaborative, and where AAPI communities are self-determined, empowered, and engaged.

*Appendix*

Asian Law Alliance

The Asian Law Alliance (ALA), founded in 1977, is a non-profit public interest legal organization with the mission of providing equal access to the justice system to the Asian and Pacific Islander communities in Santa Clara County, California.

Asian Pacific American Labor Alliance, AFL-CIO (APALA)

Asian Pacific American Labor Alliance, AFL-CIO (APALA) is the first and only national organization of AAPI union members and allies to advance worker, immigrant, and civil rights. Backed by the AFLCIO, APALA has 18 chapters and a national office in Washington, D.C. Since its founding in 1992, APALA has played a unique role in serving as the bridge between the broader labor movement and the AAPI community.

Asian Pacific American Legal Resource Center

Asian Pacific American Legal Resource Center is a legal services organization that assists low-income Asian Pacific Islander legal permanent residents through the naturalization process.

Asian Services in Action

Asian Services in Action (ASIA) Inc. provides essential social services, community advocacy, and legal assistance for foreign born clients including preparation and filing of hundreds of citizenship applications yearly.

*Appendix*

AZAPIAVote Table

AZAPIAVote Table is a non-profit, nonpartisan voting advocacy organization dedicated to the advancement of Asian and Pacific Islander Americans socially, politically and economically through voting participation.

Center for Constitutional Rights

The Center for Constitutional Rights (CCR) is a national non-profit legal and educational organization dedicated to advancing and protecting the rights guaranteed by the United States Constitution and international human rights law. Founded in 1966, CCR has a long history of litigating cases on behalf of those with the fewest protections and least access to legal resources, including numerous landmark civil and human rights cases fighting for racial and immigrant justice. CCR's recent work on behalf of immigrant communities includes challenges to abusive immigration detention practices and warrantless home raids as well as lawsuits seeking information about federal immigration practices under the Freedom of Information Act.

Chicago Lawyers' Committee for Civil Rights

We are civil rights lawyers and advocates working to secure racial equity and economic opportunity for all. We provide legal representation through partnerships with the private bar, and collaborate with grassroots organizations and other advocacy groups to implement community-based solutions that advance civil rights. Our vision is

to root out and dismantle deeply entrenched systems of discrimination, racism, and economic oppression. We believe in the power of the law to uplift and give voice to those individuals, organizations, and communities most impacted by poverty and racial disparity, including racial and ethnic groups, religious minorities, women, immigrants, LGBTQ people, and people with disabilities.

Chinese American Citizens Alliance - Portland Lodge

The Chinese American Citizens Alliance is over 100 years old with 18 lodges across the U.S. The C.A.C.A. - Portland Lodge's mission is three-fold: to develop leadership, serve the community and promote civil rights. We do this through civic education and engagement, development of youth leadership and youth basketball programs, academic scholarships and partnerships with non-profits serving the Chinese community.

Chinese for Affirmative Action

Chinese for Affirmative Action was founded in 1969 to protect the civil and political rights of Chinese Americans and to advance multiracial democracy in the United States. Today, CAA is a progressive voice in and on behalf of the broader Asian and Pacific American community. We advocate for systemic change that protects immigrant rights, promotes language justice, and remedies racial injustice.

*Appendix*

Chinese Community Center in Houston

The Chinese Community Center is the largest Asian-led social services agency in the southwest U.S. The mission of the Center is to bridge East and West by enriching families through cultural, educational, and social services.

Citizenship News

Citizenship News is a blog for citizenship educators that keeps them abreast of developments and resources that may be helpful to them.

Connecticut Asian Pacific American Bar Association

The Connecticut Asian Pacific American Bar Association is a legal organization comprised of Asian Pacific American lawyers, judges and law students, as well as others interested in Asian Pacific American issues.

Council on American-Islamic Relations

The Council on American-Islamic Relations (CAIR) is the largest American Muslim civil liberties nonprofit organization in the nation. CAIR's mission is to enhance understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding. CAIR is a leading expert on issues of importance to the American Muslim community, including issues of civil and immigrants' rights. The organization is headquartered in Washington, D.C. and has 30 chapters in 22 states across the nation.

*Appendix*

Demos

Demos is a public policy organization working for an America where we all have an equal say in our democracy and an equal chance in our economy. Demos engages in litigation, research, and advocacy to further its mission of ensuring that we have an inclusive democracy where all voices can be heard.

Filipino Bar Association of Northern California

The Filipino Bar Association of Northern California (FBANC) is one of the oldest Filipino-American bar associations in the nation with a mission to advance equality and guard against injustices targeting not only the Filipino community, but the rights of all minority communities. As an organization comprised of Filipino-American attorneys, judges, law professors, law students and allies, FBANC stands in solidarity with immigrants' rights and civil rights groups.

Fred T. Korematsu Center for Law and Equality

The Fred T. Korematsu Center for Law and Equality is a civil rights organization whose mission is to advance the legacy of Fred Korematsu.

Georgia Association of Latino Elected Officials (GALEO)

Georgia Association of Latino Elected Officials (GALEO) is a non-partisan and nonprofit organization founded in Georgia under Section 501(c)(6) of the Internal Revenue

Code. It was established to increase representation of Latino elected and appointed officials, to proactively address issues and needs facing the Latino community, and to engage Georgia's Latino community in the democratic and political process. GALEO's mission is to increase civic engagement and leadership development of the Latino/Hispanic community across Georgia; its activities include assisting in the preparation of legal permanent residents' naturalization applications at public workshops. GALEO's membership includes Latino and non-Latino citizens and non-citizens across the state of Georgia.

HIAS and Council Migration Services, Inc. d/b/a HIAS Pennsylvania

HIAS Pennsylvania is a non-profit 501(c)(3) organization that was founded in 1882 to assist Jewish immigrants fleeing persecution from Europe. Today it provides legal and supportive services to immigrants, refugees and asylum seekers from all backgrounds in order to assure their fair treatment and full integration into American society. HIAS Pennsylvania advocates for just and inclusive public policies and practices.

Hispanic Association of Colleges and Universities

The Hispanic Association of Colleges and Universities (HACU), founded in 1986 and headquartered in San Antonio, TX, represents more than 470 colleges and universities committed to Hispanic higher education success in the U.S. and Puerto Rico. HACU's member institutions enroll two-thirds of the nation's Hispanic

college students and six million students altogether. Many students at HACU member colleges and universities are naturalized citizens or American-born children of naturalized citizens. The threat of loss of citizenship for them or for family members would be extremely disruptive to their educational pursuits.

Hispanic National Bar Association

The membership of *amicus curiae* the Hispanic National Bar Association (HNBA) comprises thousands of Latino lawyers, law professors, law students, legal professionals, state and federal judges, legislators, and bar affiliates across the country. The HNBA supports Hispanic legal professionals and is committed to advocacy on issues of importance to the 53 million people of Hispanic heritage living in the United States. The HNBA regularly participates as amicus in cases concerning immigration issues.

Illinois Coalition for Immigrant and Refugee Rights

The Illinois Coalition for Immigrant and Refugee Rights (ICIRR) is a non-profit, nonpartisan statewide organization dedicated to promoting the rights of immigrants and refugees to full and equal participation in the civic, cultural, social, and political life of our diverse society. In partnership with its member organizations, ICIRR educates and organizes immigrant and refugee communities to assert their rights; promotes citizenship and civic participation; monitors, analyzes, and advocates on immigrant-related issues; and informs the general

public about the contributions of immigrants and refugees. ICIRR promotes naturalization among eligible legal immigrants and administers the New Americans Initiative, a partnership with the State of Illinois to assist immigrants with their naturalization applications.

Immigrant Legal Resource Center

The Immigrant Legal Resource Center (ILRC) works with immigrants, community organizations, legal professionals, law enforcement, and policy makers to build a democratic society that values diversity and the rights of all people. Through community education programs, legal training and technical assistance, and policy development and advocacy, the ILRC's mission is to protect and defend the fundamental rights of immigrant families and communities. The New Americans Campaign, led by the ILRC, is a non-partisan innovative and unprecedented effort that brings together a coalition of funders, leading national immigration and service organizations, and over one hundred local service providers across 18 different cities to help aspiring Americans reach their dream of citizenship.

Japanese American Bar Association

The Japanese American Bar Association has a special interest in protecting the immigration rights and statuses of visa holders and citizens as 75 years ago, many of the 120,000 people who were interned during WWII were American citizens.

*Appendix*

Just Foreign Policy

Just Foreign Policy works for reform of U.S. foreign policy, including U.S. compliance with international agreements on refugees and migration.

League of United Latin American Citizens

LULAC is the largest and oldest Hispanic organization in the United States. The mission of the League of United Latin American Citizens is to advance the economic condition, educational attainment, political influence, housing, health and civil rights of the Hispanic population of the United States.

League of Women Voters of the United States

The League of Women Voters of the United States (the League) is a nonpartisan, community-based organization that encourages the informed and active participation of citizens in government and influences public policy through education and advocacy. Founded in 1920 as an outgrowth of the struggle to win voting rights for women, the League is organized in over 700 communities and in every state, with more than 150,000 members and supporters nationwide. The League of Women Voters was founded upon the belief that our democracy is enhanced by a diversity of voices. Immigrants have helped weave the fabric and identity of our nation. All persons should receive fair treatment under the law.

*Appendix*

Legal Aid at Work

Legal Aid at Work (LAAW) is a nonprofit public interest law firm, based in San Francisco, whose mission is to protect and expand the employment rights of underrepresented worker communities through impact litigation, direct legal services, and policy and legislative advocacy. LAAW's National Origin and Immigrants' Rights Project focuses on representing national origin minority and immigrant workers who face discrimination and other forms of workplace exploitation.

Make the Road New York

With over 20,000 members across Brooklyn, Queens, Staten Island and Long Island, Make the Road New York builds the power of Latino and working class communities to achieve dignity and justice through organizing, policy innovation, transformative education, and legal and survival services.

Michigan Immigrant Rights Center

The Michigan Immigrant Rights Center (MIRC) is a statewide resource for Michigan's immigrants and immigration advocates.

Muslim Public Affairs Council

Muslim Public Affairs Council (MPAC) improves understanding and policies that affect American Muslims.

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National Asian Pacific American Bar Association

The National Asian Pacific American Bar Association (NAPABA) is the national association of Asian Pacific American attorneys, judges, law professors, and law students, representing the interests of over 75 state and local Asian Pacific American bar associations and nearly 50,000 attorneys who work in solo practices, large firms, corporations, legal services organizations, nonprofit organizations, law schools, and government agencies. Since its inception in 1988, NAPABA has served as the national voice for Asian Pacific Americans in the legal profession, and has promoted justice, equity, and opportunity for Asian Pacific Americans. NAPABA advocates for the rights of immigrants and fair laws that safeguard the equality of all citizens.

National Association of Social Workers

The National Association of Social Workers (NASW) is the largest membership organization of professional social workers in the world, with 130,000 members in 55 chapters. NASW works to enhance the professional growth and development of its members, create and maintain professional standards, and advance sound social policies. In alignment with its mission, NASW establishes professional standards, resources, and policies to support quality social work practices.

National Bar Association

The National Bar Association (NBA) is the largest and oldest association of predominantly African-American attorneys and judges in the United States. The NBA was founded in 1925 when there were only 1,000 African-American attorneys in the entire country and when other national bar associations, such as the American Bar Association, did not admit African-American attorneys. Throughout its history, the NBA consistently has advocated on behalf of African Americans and other minority populations regarding issues affecting the legal profession. The NBA represents approximately 66,000 lawyers, judges, law professors, and law students, and it has over eighty affiliate chapters throughout the world.

National Council of Asian Pacific Americans (NCAPA)

The National Council of Asian Pacific Americans (NCAPA) is a coalition of 34 national Asian Pacific American organizations around the country. Based in Washington, D.C., NCAPA serves to represent the interests of the greater Asian American (AA) and Native Hawaiian Pacific Islander (NHPI) communities and to provide a national voice for the communities' concerns.

National Council of Jewish Women

The National Council of Jewish Women (NCJW) is a grassroots organization of 90,000 volunteers and advocates who turn progressive ideals into action. Inspired by Jewish values, NCJW strives for social justice by improving the

quality of life for women, children, and families and by safeguarding individual rights and freedoms. NCJW's Resolutions state that NCJW resolves to work for "[c]omprehensive, humane, and equitable immigration, refugee, asylum, and naturalization laws, policies, and practices that facilitate and expedite legal status and a path to citizenship for more individuals."

The National Employment Law Project

The National Employment Law Project (NELP) is a non-profit legal and research organization that has for more than 45 years advocated for the employment and labor rights of low-wage, unemployed, and immigrant workers. NELP seeks to ensure that all workers, and especially the most vulnerable ones, receive the full protection of labor laws, and that employers are not rewarded for skirting those basic rights. NELP's areas of expertise include the workplace rights of immigrants, and NELP has testified in Congress regarding these matters, and has litigated directly and participated as amicus in numerous cases before Circuits and the U.S. Supreme Court.

National Federation of Filipino American Associations (NaFFAA)

The National Federation of Filipino American Associations (NaFFAA) is a non-profit, non-partisan organization. Established in 1997, NaFFAA has been the standard bearer for promoting the welfare and well-being of the 4 million Filipinos and Filipino Americans throughout the United States. NaFFAA is the largest national affiliation

of Filipino American institutions, umbrella organizations, and individuals. Its thirteen member regions cover the continental United States, Alaska, Hawaii, and the Pacific Islands. NaFFAA's vision is to serve as the voice of all Filipinos and Filipino Americans by uniting, engaging, and empowering diverse individuals and community organizations around three key areas: leadership development, civic engagement, and national advocacy.

National Filipino American Lawyers Association

The National Filipino American Lawyers Association (NFALA) is a national association of Filipino-American attorneys, judges, law professors, and law students dedicated to promoting the professional development, interests, and success of Filipino-American legal professionals nationwide. NFALA represents over 1,000 attorneys and various state and local Filipino-American bar associations. NFALA is the voice for the national Filipino-American legal community and strives to fight for equal opportunity and the rights of underserved minority groups.

National Immigration Forum

Founded in 1982, the National Immigration Forum (Forum) advocates for the value of immigrants and immigration to the nation. The Forum promotes naturalization because it develops a diverse citizenry fully invested in and contributing to all aspects of civic and economic life in the U.S. Our New American Workforce program works with businesses across the nation to assist

their eligible immigrant employees with the citizenship process through a two-step process that targets legal permanent residents at their workplaces. We are also a National Partner in The New Americans Campaign, a nonpartisan national network of legal-service providers, faith-based organizations, businesses, foundations and community leaders promoting citizenship and addressing barriers to naturalization.

National Iranian American Council

The National Iranian American Council is a nonpartisan, nonprofit organization dedicated to strengthening the voice of Iranian Americans and promoting greater understanding between the American and Iranian people.

National Justice for Our Neighbors

NJFON supports a national network of immigration legal service organizations affiliated with the United Methodist Church. In addition to conducting direct legal services for low-income immigrants, our network advocates for access to justice and policies that uphold the dignity of our immigrant brothers and sisters.

National Korean American Service & Education Consortium (NAKASEC)

NAKASEC's mission is to organize Korean and Asian American communities to achieve social, economic, and racial justice. Its main issue areas include immigrant rights, immigration reform, civic engagement, and immigrant youth/adult/senior leadership development.

*Appendix*

National Organization for Women Foundation

The National Organization for Women (NOW) Foundation is a 501(c)(3) entity affiliated with the National Organization for Women, the largest grassroots feminist activist organization in the United States with chapters in every state and the District of Columbia. NOW Foundation is an education and litigation organization committed to advancing equal rights for women and ensuring that all women are treated fairly and equally under the law. NOW Foundation works to advance the rights of immigrant women and is concerned about the harmful effects on women and their families of unwarranted prosecution and denaturalization as result of immaterial misstatements made during the naturalization process. Our country is well served when we welcome immigrants who make a sustained positive contribution to their communities, and overzealous enforcement policies will cause us to lose those benefits.

The New York Immigration Coalition

The New York Immigration Coalition (NYIC) is an umbrella policy and advocacy organization for nearly 200 groups in New York State. Our mission is to unite immigrants, members, and allies so all New Yorkers can thrive. We represent the collective interests of New York's diverse immigrant communities and organizations and devise solutions to advance them; advocate for laws, policies, and programs that lead to justice and opportunity for all immigrant groups; and build the power of immigrants and the organizations that serve them to

ensure their sustainability, to improve people's lives, and to strengthen our state. We work hard to promote access to US citizenship for all eligible New Yorkers, including through our advocacy work as well as coordination of services.

North Carolina Asian Americans Together

North Carolina Asian Americans Together works to bring the Asian American and Pacific Islander community in North Carolina together through civic engagement and political participation.

OCA - Asian Pacific American Advocates

OCA - Asian Pacific American Advocates (OCA) is a national, membership-driven organization dedicated to advancing the social, political, and economic wellbeing of Asian Pacific Americans. Through its 100 chapters and affiliates across the nation, OCA engages in policy advocacy, community organizing, and programming to advance the civil rights of Asian Pacific Americans, including the protection of immigrant and refugee rights.

OCA-Asian Pacific American Advocates Greater Houston Chapter

OCA-Asian Pacific American Advocates Greater Houston Chapter is a social justice, leadership and civil rights advocacy organization of community advocates that works with the immigrant community in Houston, TX. We organize citizenship assistance forums on a monthly basis in Houston.

*Appendix*

OCA-Detroit

OCA-Detroit is a chapter of OCA-Asian Pacific American Advocates, a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of Asian Pacific Americans (APAs) in the United States. OCA was founded as the Organization of Chinese Americans in 1973.

OCA-Greater Seattle

The Greater Seattle Chapter of OCA-Asian Pacific American Advocates was formed in 1995 and since that time it has been serving the Greater Seattle Chinese and Asian Pacific American community as well as other communities in the Pacific Northwest. It is recognized in the local community for its advocacy of civil and voting rights as well as its sponsorship of community activities and events.

Organization of Chinese Americans-New York Chapter

OCA-NY's core mission is to enhance the civil rights interests of the Asian, Asian American and Pacific Islander community in the United States. We believe the Sixth Circuit's holding in the present case, which allows immaterial statements made by a naturalized American citizen during his or her naturalization process to be used by the United States government as a basis to strip his or her citizenship, to be inapposite to the ideals and principles of our Constitution.

OneAmerica

OneAmerica is Washington State's largest immigrant and refugee advocacy organization. OneAmerica also manages the Washington New Americans program (WNA), which provides free legal assistant on naturalization applications for eligible individuals throughout Washington State.

Project Vote

Project Vote, Inc. is a national nonpartisan, non-profit 501(c)(3) based in Washington, DC whose mission is to build an electorate that accurately represents the diversity of America's citizenry. Through its research, advocacy, technical assistance, and direct legal services, Project Vote works to ensure that every eligible citizen is able to register, vote, and cast a ballot that counts. There are issues similar to those in the present case that come up in the context of voter registration, where individuals lose their rights or face potential harm as a result of immaterial misstatements or inadvertent errors. We have a strong interest in ensuring that the government cannot wield unchecked power to deprive individuals of their rights solely on the basis of such immaterial mistakes.

South Asian Americans Leading Together (SAALT)

SAALT is a national, non-partisan, non-profit organization that fights for racial justice and advocates for the civil rights of all South Asians in the United States. Our ultimate vision is dignity and full inclusion for all.

*Appendix*

South Asian Bar Association of Southern California

The South Asian Bar Association of Southern California (SABA-SC) is dedicated to the advancement and development of South Asian attorneys as well as attorneys interested in issues affecting the South Asian community.

Southeast Asia Resource Action Center (SEARAC)

The Southeast Asia Resource Action Center (SEARAC) is a national organization that empowers Cambodian, Laotian, and Vietnamese American communities who came to this country as the largest group of refugees ever resettled in the U.S. Due to outdated immigration laws passed in 1996 expanding deportable offenses for green card holders, almost 16,000 community members have received final orders of deportation since 1998. Acquiring citizenship is the best line of defense for our communities to fight deportation, but access to information and financial and cultural barriers makes the process daunting. SEARAC rejects efforts to strip naturalized citizens of citizenship on the basis of irrelevant misstatements made during the naturalization process, the fear of which would likely discourage many eligible green card holders from acquiring citizenship.

Southeast Asian Coalition

The Southeast Asian Coalition (SEAC) is a grassroots non-profit organization based in Charlotte, North Carolina. SEAC is a member of the New Americans Campaign and seeks to serve the Southeast Asian American refugee

community, build community empowerment, as well as add to the collective fight for justice for all communities in North Carolina through youth organizing, base-building and civic engagement, and advocacy programs.

Southern Poverty Law Center

The Southern Poverty Law Center (SPLC) has provided pro bono civil rights representation to low income persons in the Southeast since 1971, with a particular focus on combating unlawful discrimination. SPLC has litigated numerous cases to enforce the civil rights of immigrants, including cases to defend against state efforts to obstruct refugee resettlement.

Thai Community Development Center

Thai Community Development Center (Thai CDC) is a non-profit organization founded in 1994 to provide programs and services to low-income Thai immigrants. Since its establishment, Thai CDC has addressed the multifaceted needs of Thai immigrants in the Southern California region, who, at an estimated population of 100,000, are considered the largest number of Thais living abroad. Thai CDC offers a broad range of social and human services and also engages in extensive education and advocacy efforts, including providing legal clinics and advocating for a humane immigration policy.

*Appendix*

T'ruah: The Rabbinic Call for Human Rights

T'ruah: The Rabbinic Call for Human Rights brings together more than 1800 rabbis and cantors from all streams of Judaism, together with all members of the Jewish community, to act on the Jewish imperative to respect and advance the human rights of all people.